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COURTNEY M. PRICE
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**American
Chemistry
Council** *Good Chemistry
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June 28, 2002

Christine Todd Whitman
Administrator
US Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116
ATTN: Chemical Right-to-Know Program

02 JUL -2 PM 12:47

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Re: Comments received on the Petroleum Additives Panel, HERTG HPV Challenge Test Plan for the alkaryl sulfonate category

Dear Administrator Whitman:

On October 8, 2001, the American Chemistry Council, Petroleum Additives Panel, Health, Environmental and Regulatory Task Group (HERTG) submitted a test plan and supporting robust summaries for the following twelve chemicals in the alkaryl sulfonate category:

- sulfonic acids, petroleum, calcium salts - (CAS # 61789-86-4)
- sulfonic acids, petroleum, barium salts - (CAS # 61790-48-5)
- sulfonic acids, petroleum, sodium salts - (CAS # 68608-26-4)
- sulfonic acids, petroleum, calcium salts, overbased - (CAS # 68783-96-0)
- benzenesulfonic acid, mono-C16-C24 alkyl derivatives, calcium salts- (CAS # 70024-69-0)
- benzenesulfonic acid, mono-C15-C30 branched alkyl and di-C11-C13 branched and linear alkyl derivatives, calcium salts, overbased - (CAS # 71486-79-8)
- benzenesulfonic acid, mono-C15-C30 branched alkyl and di-C11-C13 branched and linear alkyl derivatives - (CAS # 71549-79-6)
- benzenesulfonic acid, mono and dialkyl derivatives, magnesium salts - (CAS # 71786-47-5)
- benzenesulfonic acid, C15-C30 alkyl derivatives, sodium salts - (CAS # 78330-12-8)
- benzenesulfonic acid, C14-C24 branched and linear alkyl derivatives, calcium salts - (CAS # 115733-09-0)
- benzenesulfonic acid, C14-C24 branched and linear alkyl derivatives, calcium salts, overbased - (CAS # 115733-10-3)
- benzenesulfonic acid, C14-C24 branched and linear alkyl derivatives - (CAS # 115829-36-2)



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June 28, 2002

Page 2

The HERTG has received comments from EPA on the test plan and robust summaries for the alkaryl sulfonate category. In addition to the comments received from the EPA, the HERTG is also aware of comments that were sent from the Physicians Committee for Responsible Medicine (PCRM) to the EPA.

The HERTG appreciates the efforts of both EPA and PCRM in preparing comments and is reviewing the recommendations presented in the comments. The HERTG will carefully consider those recommendations, and how they may enhance the existing test plan as the work gets underway for the alkaryl sulfonate category.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR